

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and
JOHN MEINERS, Individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF
REALTORS, COMPASS, INC., EXP
WORLD HOLDINGS, INC., REDFIN
CORPORATION, WEICHERT
REALTORS, UNITED REAL ESTATE, and
DOUGLAS ELLIMAN, INC.,

Defendants.

Case No. 4:23-cv-00788-SRB

The Hon. Stephen R. Bough

Oral Argument Requested

MOTION OF COMPASS, INC. TO STRIKE CLASS ALLEGATIONS

Pursuant to Fed. R. Civ. P. 12(f), defendant Compass, Inc. (“Compass”), by its attorneys, moves to strike Plaintiffs’ allegation of a nationwide class from the Class Action Complaint (“Complaint”) on the basis that Plaintiffs’ alleged class includes certain putative class members who entered into agreements with Compass to arbitrate their disputes and putative class members who waived their ability to participate in class actions against Compass. In support of this motion, Compass relies on its brief that is being filed concurrently and the Declaration of Chahira Solh accompanying that brief – as well as the pleadings and records on file with this Court and such argument as may be presented at any hearing on this motion. As set forth in the accompanying brief, the overbroad class action allegations should be stricken from the complaint.

Dated: February 26, 2024

Respectfully submitted,

/s/ Daniel A. Sasse

Daniel A. Sasse (MO # 48997)

Chahira Solh (admitted *pro hac vice*)

Eric Fanchiang (admitted *pro hac vice*)

CROWELL & MORING LLP

3 Park Plaza, 20th Floor

Irvine, CA 92614-8505

(949) 263-8400

csolh@crowell.com

dsasse@crowell.com

efanchiang@crowell.com

Attorneys for Defendant Compass, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Daniel A. Sasse

Daniel A. Sasse

Attorney for Defendant Compass, Inc.